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Before the  
Federal Communications Commission  
Washington, D.C. 20554

FILED/ACCEPTED  
JUL 24 2007

Federal Communications Commission  
Office of the Secretary

In the Matter of )  
 )  
Third Periodic Review of the ) MB Docket No. 07-91  
Commission's Rules and Policies )  
Affecting the Conversion to )  
Digital Television )

TO: The Commission

**COMMENTS**

Sorensen Television Systems, Inc. ("Sorensen"), licensee of Television Station KTGM-TV, Tamuning, Guam, by its attorney, hereby submits its Comments in the above-referenced rulemaking. In support thereof, the following is respectfully shown:

1. Television Station KTGM-TV currently operates on Channel 14. KTGM-TV is the sole ABC network affiliate in Guam and, through its rebroadcast of the network's service on KPPI-LP,<sup>1</sup> to Garipan, Saipan. While KTGM's currently expired construction permit is for DTV Channel 17,<sup>2</sup> the DTV Build-Out Order, FCC 07-90, released May 18, 2007, included a DTV Table of Allotments which specified Channel 14 for Tamuning, Guam.

2. In the Notice of Proposed Rulemaking in this Docket, FCC 07-70, released May 18, 2007, at paragraph 65, the Commission proposed the following:

<sup>1</sup> The Station's construction permit, BPCDT-19991101ADS, was inadvertently allowed to expire by the previous licensee on December 7, 2002. The previous construction permit authorized digital television operation on Channel 17. On June 6, 2007, Sorensen filed a request for reinstatement and extension of that construction permit.

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Pre-Transition DTV Channel Unbuilt or Not in Operation. We propose to permit a station that has not constructed an operational pre-transition DTV facility to elect simply to return its CP for that facility to the Commission and focus its efforts on construction of its post-transition facility. Thus, a station that has either not begun construction of its pre-transition DTV facility or has not begun operating that facility, and will be moving to a different channel at the end of the transition, may return the CP for that facility to the Commission. As stations in this situation are not currently providing digital service to the public, we believe it is appropriate at this stage in the transition to allow these channel to be returned. We request comment on this approach. Stations electing this option would be required to obtain flash cut approval in accordance with the proposals discussed in Section V.B., supra. Stations electing this approach would be able to carry over interference protection to their post-transition channel, as noted above.

3. Sorensen strongly supports the Commission's proposal. Assuming that the Commission grants Sorensen's pending request for reinstatement and extension of its expired construction permit, upon reinstatement Sorensen would, when required, return its construction permit for Channel 17. KTGM would then necessarily obtain flash cut approval for Channel 14. Once that approval is granted, KTGM would be able to focus its efforts on construction of its post-transition facility, i.e., DTV Channel 14.

4. Therefore, Sorensen strongly supports the Commission's proposal to permit a station that has constructed or operated its pre-transition DTV facility and will be moving to a different channel to elect simply to return its construction permit for that facility, so as to

allow the Station to focus its efforts of construction of its post-transition facility by obtaining flash cut approval.

Respectfully submitted,

SORENSEN TELEVISION SYSTEM, INC.

A handwritten signature in dark ink, appearing to read "Allan Moskowitz", is written over a horizontal line.

Allan G. Moskowitz  
Its Attorney

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July 24, 2007